

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF MICHIGAN**

In re:

LARRY ALLEN CLUCHEY,  
Debtor.

Case No. 21-00524-jwb

Chapter 7

WORLD ENERGY INNOVATIONS,  
LLC, f/d/b/a WORTHINGTON ENERGY  
INNOVATIONS, LLC,

Plaintiff

v.

Adv. Proc. No. 21-80053-jwb

LARRY ALLEN CLUCHEY,  
SHERRY D. CLUCHEY,

Defendants.

**NOTICE OF OPPORTUNITY TO OBJECT TO PLAINTIFF'S MOTION TO DISMISS  
SECTION 727 CAUSES OF ACTION PURSUANT TO BANKRUPTCY RULE 7041  
[RELATED TO DOC 62]**

**PLEASE TAKE NOTICE** that on January 5, 2023, Plaintiff filed its *Motion to Dismiss Section 727 Causes of Action Pursuant to Bankruptcy Rule 7041* (the “Motion”) with the United States Bankruptcy Court for the Western District of Michigan (the “Court”). In its Motion, Plaintiff seeks dismissal of the causes of action in Plaintiff’s Amended Complaint that are asserted under section 727 of the Bankruptcy Code.

**PLEASE TAKE FURTHER NOTICE** that any responses or objections to the Motion must be in writing and filed with the Clerk of the Court, U.S. Bankruptcy Court for the Western

District of Michigan, 1 Division Ave. N, Room 200, Grand Rapids, MI 49503, so as to be received by January 25, 2023.

**PLEASE TAKE FURTHER NOTICE** that at the same time, you must also serve a copy of the response or objection upon: (i) counsel to Plaintiff: John C. Cannizzaro, Ice Miller LLP, 250 West Street, Suite 700, Columbus, OH 43215; (ii) counsel to the Defendant Larry Cluchey: Robert F. Wardrop, II, Wardrop & Wardrop, P.C., 300 Ottawa Avenue, N.W., Ste 150, Grand Rapids, MI 49503; and (iii) counsel to Defendant Sherry Cluchey: Steven Mark Bylenga, CBH Attorneys & Counselors, 25 Division Ave S, Suite 500, Grand Rapids, MI 49503.

**PLEASE TAKE FURTHER NOTICE** that if you fail to respond in accordance with this notice, the Court may grant the relief requested in the Motion without further notice or hearing.

**PLEASE TAKE FURTHER NOTICE** that if any objection is properly filed and served in accordance with the above procedures, a subsequent notice will be sent to you of the date, time, and location of the hearing on the objection. Only objections made in writing and timely filed will be considered by the Court at such hearing.

Respectfully submitted,

*/s/ John C. Cannizzaro*  
John C. Cannizzaro  
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*Counsel for Plaintiff*